

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF
PENNSYLVANIA**

IN RE: Sheila Muhammad	:	CHAPTER 13
	:	
Movant-Debtor	:	CASE NO.: 23-10334\mdc
	:	
v.	:	
	:	
U. S. Bank Trust National Association	:	
Respondent-Creditor		

MOTION TO DETERMINE VALUE

Debtor seeks a determination of U. S. Bank Trust National Association (“Creditor”) secured claim under Section 506 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 3012, and respectfully represents:

1. Movant seeks a determination of the value of the Creditor’s secured claim for Debtor residence situated at 7109 Phoebe Place, Philadelphia, PA 19153 (“Subject Property”).
2. U. S. Bank Trust National Association (“Creditor”) holds state court judgement lien against the subject property & alleges to hold a secured claim in the amount of \$191,159.41. Attached hereto and marked as Exhibit “A” is aforesaid Proof of Claim.
3. The Subject property is encumbered by several superior City of Philadelphia statutory liens.
4. Debtor contends that the fair market value of the Subject property based on the its age, condition, and location is no greater than **\$60,000.00.**
5. The subject property is in very poor condition and requires extensive rehabilitation repairs. Attached hereto and marked as Exhibit “B” is aforesaid fair market appraisal.

WHEREFORE, Debtor requests this Honorable Court to bifurcate the Proof of Claim No. 10-1 as filed by U. S. Bank Trust National Association into a secured claim of **\$60,000.00** and unsecured for the remaining balance of Creditor’s claim.

Respectfully Submitted,

/s/ Michael D. Sayles
Michael D. Sayles
427 Cheltenham Ave.
Suite #2
Elkins Park, PA 19027
215.635.2270
Midusa1@comcast.net

Dated: December 7, 2023